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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

The Use of N11 Codes and
Other Abbreviated Dialing
Arrangements

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CC Docket No. 92-105

ORIGINAL
FILE

COMMENTS

GTE Service Corporation, on behalf of its affiliated domestic telephone and cellular companies ("GTE"), submits its Comments on the Commission's Notice of Proposed Rulemaking ("Notice") in the proceeding captioned above.¹

INTRODUCTION

In this proceeding, the Commission is considering whether it should adopt rules regarding the assignment of N11 codes. N11 or "service codes" are presently used by the local exchange carriers ("LECs") and other network operators for special local functions such as traditional directory assistance (411) and emergency service (911). The Commission's Notice was prompted by the Petition of Bell South Corporation ("Bell South") for a ruling declaring that the assignment of N11 codes to enhanced service providers ("ESPs") "for 'local pay per call type information services' would be consistent with the Communications Act and Commission policies."²

GTE strongly opposes the Commission's proposal. Service codes are a scarce public resource that should be used in the

¹ FCC 92-203, released May 6, 1992.

² Notice at ¶2.

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most effective and efficient manner possible, one that benefits the public at large. Making N11 numbers available as abbreviated dialing codes for information services is a costly, possibly short-lived undertaking that benefits only a few service providers and affords no new and otherwise unavailable services for the public. As such, the use of N11 codes by ESPs or any other service provider for competitive services -- including those competitive services provided by LECs or cellular carriers -- does not serve the best interests of the public. Accordingly, the Commission should refrain from adopting its proposed rules. Any rules adopted by the Commission in this proceeding should affirm the traditional use of N11 numbers, i.e., to facilitate public access to the underlying network.

DISCUSSION

N11 Codes Have Traditionally Been Used For Services that Benefit the Public At Large.

In the Notice, the Commission tentatively concludes that N11 numbers other than 411 and 911 should be available for abbreviated dialing as long as the codes can be recalled on short notice in the event they are needed for use as numbering plan area ("NPA") codes.³ GTE believes that the Commission's proposal is seriously flawed.

Without question, service codes are a limited public resource. For years, N11 codes have been assigned by the Administrator of the North American Numbering Plan ("NANPA") on a national basis for the same purposes. Of the eight available N11

³ Id. at ¶¶12-13.

codes, only four have been assigned: 411 for local directory assistance, 611 for repair service, 811 for business office services, and 911 for emergency services.⁴ Unassigned service codes are available for local use if such assignment and use can be discontinued on short notice.⁵ With the exception of 911, service codes are network-specific; thus, 811 dialed on a residential wireline phone does not reach the same business service center that is reached when one dials 811 on a cellular phone.

In the case of GTE, its telephone operating companies use all available N11 codes, although not all codes are used in all locations. Its cellular companies use 611 (as well as 711 and 811) for customer access to business service centers. In all cases, the service codes are used for emergency services or to provide customers with access to network support services. None of the GTE companies uses its N11 codes to provide enhanced services. While there has been some discussion of other LECs using their N11 codes for information services, such use is not widespread today.

Thus, the N11 codes serve a distinct purpose for the public, and through the years the public has learned to associate the service codes with certain types of services. Specifically, the public has come to associate the N11 numbers with services that facilitate their use of the network. These services benefit the public at large and cost little or nothing for the individual

⁴ BOC Notes on the LEC Networks - 1990, Numbering Plan and Dialing Procedures, Issue 1, March 1991, at 3-1.

⁵ Id.

subscriber to use. Simply put, GTE sees no valid reason why this should change.

Conversion of N11 Numbers to Abbreviated
Dialing Codes Entails Substantial Costs.

Indeed, it appears that the costs associated with the use of N11 codes for competitively-provided services substantially outweigh the benefits. For the GTE telephone companies, substantial network changes would be required to make N11 codes available to enhanced and other such service providers, since the use of service codes in this manner would require number translation. While common control end offices will be able to handle N11 code translations with software changes, electromechanical end offices present a much greater problem. Unless appropriate equipment is already available in a particular end office, substantial regrading would be required in addition to new number selectors. Over 1,000 of GTE's end offices are still equipped with electromechanical switches.

Further modifications to GTE's end offices would be required if the LECs are to record and bill N11 calls. At present, the majority of GTE's end offices are not equipped to record end user-dialed N11 numbers.⁶ All of GTE's end offices, both common control and electromechanical, would have to be equipped with local measured service capability in order to provide recording

⁶ Where GTE's telephone companies charge for directory assistance calls, those calls are recorded by making them appear to the switch as toll calls. This means that GTE's customers must dial 1+411 rather than 411 for directory assistance.

and billing functions to enhanced and other such service providers.

The conversion of N11 numbers to abbreviated dialing codes for competitively-provided services would necessitate substantial effort and costs in other areas as well. For example, customers would have to be reeducated on the new use of N11 codes. Since customers presently associate N11 numbers with public access type services, it is reasonable to assume that customer confusion will be substantial. This will be particularly true if N11 codes are assigned to different service providers in different locations. If telephone and cellular companies are required to relinquish the N11 numbers they use to provide access to network support, then new numbers will have to be assigned for these services. Where extended area service is offered cooperatively among more than one exchange carrier, the carriers involved will have to coordinate their deployment of service codes in some fashion.

At the Same Time, the Benefits of
Using N11 Numbers as Abbreviated
Dialing Codes is Questionable At Best.

Thus, the costs associated with converting N11 numbers into abbreviated dialing codes for competitive services are considerable. Yet the benefits of such efforts are questionable for the public at large. The use of service codes for competitive services will not give the public access to some new service which could not be made available via existing dialing arrangements. No one in this proceeding has suggested thus far that enhanced and other competitive services cannot be adequately

provided using the presently available seven (976-XXXX) or ten (800/900-NXX-XXXX) digit formats. While only six (6) N11 numbers are arguably available, there are millions of 976, 800, and 900 numbers that can be assigned today to enhanced and other competitive service providers without extraordinary cost.

Further, even if the public does realize some benefit from the conversion of N11 numbers into abbreviated dialing codes, the public's enjoyment of such benefit may be brief. The impending exhaustion of NPAs in the current N0/1X format is well-known. As the NANPA has observed⁷ and the Commission recognizes in its Notice,⁸ there is a real possibility that N11 numbers will have to be put into use as NPA codes prior to the time that interchangeable NPAs can be implemented.⁹ If N11 numbers are indeed called into service for use as NPAs after they have been converted into abbreviated dialing codes, then a considerable amount of effort and expense will have gone for naught. Indeed, the LECs and the cellular carriers will be required to spend additional funds to reeducate the public on the latest use of the N11 codes and otherwise to unwind what they just completed. Customer confusion about the appropriate use of the service codes in this situation would be rampant.

⁷ Petition of Bell South, Exhibit A, Letter from District Manager, NANP Administration, Bellcore to Operations Manager - Processor Planning, Bell South Telecommunications, January 6, 1992, at 1-2 [hereinafter "NANPA Letter"].

⁸ Notice at ¶8.

⁹ In the NANPA Letter, the NANPA goes on to observe that its "long-term numbering proposal recommends that unassigned and recoverable N11 codes be reserved for future assignment as Service Access Codes (SACs) for ten-digit dialing..." NANPA Letter at 2.

Thus, if N11 numbers are used as abbreviated dialing codes for access to competitive services, the primary beneficiaries of this change in policy will be those few service providers who are fortunate enough to secure an N11 number. Without question, the competition for N11 numbers will be fierce. At a time when the NANPA is recommending a ten-digit format as the targeted standard for World Zone 1 (which includes the U. S.),¹⁰ a unique abbreviated dialing code would give its holder considerable advantage in the provision of service over competitors who lack such a code. Indeed, GTE's telephone operating companies have already received four (4) requests for N11 assignments.¹¹ Most notably, each request seeks a code assignment in all of GTE's end offices nationwide and is nonspecific about the service to be offered using the code.¹² These facts strongly suggest to GTE that the entities are speculating in the future value of service codes.

The Public Interest Is Best Served By
Dedicating N11 Codes to Public Access Services.

Thus, while the costs associated with the use of N11 numbers for abbreviated dialing codes are substantial, such a conversion yields little or no benefit for the public at large. As such,

¹⁰ North American Numbering Plan Administrator's Proposal on the Future of Numbering in World Zone 1, Bellcore Letter No. IL-92/01-013, January 6, 1992, at 22.

¹¹ GTE's telephone companies have received requests from MCI, Professional Business Systems, Vantage Information Systems, and Mobile Telecommunications Technologies.

¹² GTE notes that nationwide assignment of N11 codes to individual companies runs contrary to the expectations of the public, which associates N11 numbers with specific, locally-provided services.

GTE believes that use of service codes to provide access to competitively provided services does not serve the public interest. Rather, it serves the interests only of those few competitive service providers who are able to obtain N11 assignments.

Since service codes are a public resource, these numbers should be used in a manner that benefits the public at large. GTE submits that the public interest will best be served if N11 codes continue to be used in the manner in which they are currently deployed, i.e., to facilitate the public's access to the underlying network. In light of these facts, the Commission should refrain from adopting its proposed rule. If the Commission believes it is necessary to adopt some sort of guidelines on the use of N11 codes, the public interest would be better served if the Commission were to restrict the use of service codes to those services considered adjunct to basic under the Commission's Computer Inquiry II decisions.¹³ Such a rule

¹³ Amendment of Section 64.702 of the Commission's Rules and Regulations, 77 FCC 2d 384, 421 (1980), modified on recon., 84 FCC 2d 50 (1980), modified on further recon., 88 FCC 2d 512 (1981), affirmed sub nom., Computer and Communications Industry Association v. FCC, 693 F.2d 198 (D.C. Cir. 1982), cert. denied, 461 U.S. 938 (1983). Services are considered adjunct to basic if they facilitate the provision of basic services without altering the fundamental character of such basic services. North American Telecommunications Association, Petition for Declaratory Ruling under Section 64.702 of the Commission's Rules Regarding the Integration of Centrex, Enhanced Services, and Customer Premise Equipment, 101 FCC 2d 349, 359-361 (1985) [hereinafter "NATA/Centrex Order"], modified on recon. 3 FCC Rcd. 4385, 4386 (1986) [hereinafter "NATA/Centrex Reconsideration Order"]. Directory assistance services are considered adjunct to basic services. NATA/Centrex Order at 360; NATA/Centrex Reconsideration Order at 4386.

would help ensure that service codes are being used in a manner that yields the most benefit to the greatest number of people.

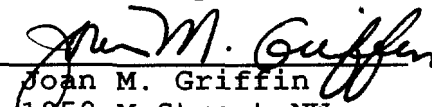
CONCLUSION

In this proceeding, the Commission is considering how to allocate a limited resource, service codes, in a manner that best serves the public interest. GTE submits that making these numbers available to ESPs and other competitive service providers for use as abbreviated dialing codes does not serve the best interests of the public at large. As GTE has demonstrated in these Comments, the costs of converting N11 numbers to abbreviated dialing codes substantially outweighs the benefits.

Accordingly, GTE urges the Commission to refrain from adopting the rules it has proposed in this proceeding. Any rules the Commission adopts regarding the use of N11 codes should limit the use of these numbers to network support services.

Respectfully Submitted,

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on behalf of its affiliated
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Certificate of Service

I, Jennifer R. McCain, hereby certify that copies of the foregoing "Comments Of GTE" have been mailed by first class United States mail, postage prepaid, on the 5th day of June, 1992 to the following parties:


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